

DEPARTMENT OF ENVIRONMENTAL CONSERVATION

AIR QUALITY OPERATING PERMIT

Permit No. 241TVP02
Application No. A000241

Issue Date: **Public Notice Draft**
Expiration Date: **Five Years**

The Department of Environmental Conservation (the Department), under the authority of AS 46.14 and 18 AAC 50, issues an operating permit to the Permittee, **Alyeska Seafoods, Inc.**, for the operation of the **Unalaska Seafood Processing Facility**.

This permit satisfies the obligation of the owner and operator to obtain an operating permit as set out in AS 46.14.130(b).

As required by AS 46.14.120(c), the Permittee shall comply with the terms and conditions of this operating permit.

After the issue date of this permit, the Permittee is no longer required to comply with the terms and conditions of Air Quality Control Permit to Operate No. 9625 AA006 or Air Quality Operating Permit No. 241TVP01, Revision 2.

All stationary source-specific terms and conditions of Air Quality Control Construction Permit No. 241CP03 have been incorporated into this Operating Permit.

This Operating Permit becomes effective on **date**.

John F. Kuterbach, Manager
Air Permits Program

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List of Abbreviations Used in this Permit

AAC	Alaska Administrative Code
ADEC	Alaska Department of Environmental Conservation
AP-42	EPA report, Compilation of Air Pollutant Emission Factors
AS	Alaska Statutes
ASTM	American Society for Testing and Materials
AWCRSA	Aleutians West Coastal Resource Service Area
bhp	boiler horsepower
C.F.R.	Code of Federal Regulations
dscf	Dry standard cubic foot
EPA	US Environmental Protection Agency
gr./dscf	grain per dry standard cubic foot (1 pound = 7000 grains)
gpy	gallons per year
HAPs or HACs	Hazardous Air Pollutants or Hazardous Air Contaminants [<i>HAPs</i> or <i>HACs</i> as defined in AS 46.14.990(14)]
ID	Emission Unit Identification Number
MMBtu/hr	Million British Thermal Units per hour
MR&R	Monitoring, recordkeeping, and reporting
NESHAPs	Federal National Emission Standards for Hazardous Air Pollutants [<i>NESHAPs</i> as contained in 40 C.F.R. 61 and 63]
NO _x	Nitrogen Oxides
NSPS	New Source Performance Standards [<i>NSPS</i> as contained in 40 C.F.R. 60]
O & M	Operation and Maintenance
O ₂	Oxygen
PM-10	Particulate Matter less than 10 microns in diameter
ppm	Parts per million
ppmv, ppmvd	Parts per million by volume on a dry basis
psia	Pounds per Square Inch (absolute)
PSD	Prevention of Significant Deterioration
RM	Reference Method
S	Sulfur
PTE	Potential to Emit
SIC	Standard Industrial Classification
SIP	State Implementation Plan
SO ₂	Sulfur dioxide
TPY	tons per year
VOC	volatile organic compound [<i>VOC</i> as defined in 18 AAC 50.990(103)]
wt%	weight percent

Section 1. Identification

Names and Addresses

Permittee:	Alyeska Seafoods, Inc. P.O. Box 31359 Seattle, Washington 98103
Facility:	Unalaska Seafood Processing Facility
Physical Address:	P.O. Box 530 Unalaska, Alaska 99685-0530
Owner:	Alyeska Seafoods, Inc. P.O. Box 31359 Seattle, Washington 98103-1359
Operator:	Alyeska Seafoods, Inc. P.O. Box 31359 Seattle, Washington 98103-1359
Permittee's Responsible Official	Mr. Joe Robinson and Mr. William Weisfield P.O. Box 31359 Seattle, Washington 98103-1359 (206) 547-2100
Designated Agent:	Hicks, Boyd, Chandler and Falconer 825 W. 8th Ave Suite 200 Anchorage, Alaska 99501
Facility and Building Contact:	Mr. Greg Peters P.O. Box 530 Unalaska, Alaska 99685-0530 (907) 581-5743
Fee Contact:	Mr. Greg Peters P.O. Box 530 Unalaska, Alaska 99685-0530 (907) 581-5743

SIC Code of the Facility: 2092

[18 AAC 50.326(a), 10/1/04]
[40 C.F.R. 71.5(c)(1 & 2), 7/1/03]

Section 2. *General Emission Information*

Emissions of Regulated Air Contaminants:

Nitrogen Oxides, Carbon Monoxide, Sulfur Dioxide, Particulate Matter, Volatile Organic Compounds, and various Hazardous Air Pollutants

Obligation for a Permit

18 AAC 50.326(a) and 40 C.F.R. 71.3(a)(5). A major stationary source of air pollutants or any group of stationary sources as defined in section 302 of the ACT, that directly emits or has the potential to emit 100 TPY or more of any air pollutant.

[18 AAC 50.326(a), 10/1/04]
[40 C.F.R. 71.5(c)(3)(i), 7/1/03]

Section 3. *Fee Requirements*

- 1. Assessable Emissions.** The Permittee shall pay to the Department annual emission fees based on the stationary source's assessable emissions as determined by the Department under 18 AAC 50.410. The assessable emission fee rate is set out in 18 AAC 50.410(b). The Department will assess fees per ton of each air pollutant that the stationary source emits or has the potential to emit in quantities greater than 10 tons per year. The quantity for which fees will be assessed is the lesser of:

- 1.1 the stationary source's assessable potential to emit of 366.8 TPY; or
- 1.2 the stationary sources projected annual rate of emissions that will occur from July 1 to the following June 30, based upon actual annual emissions emitted during the most recent calendar year or another 12 month period approved in writing by the Department, when demonstrated by

- a. an enforceable test method described in 18 AAC 50.220;
- b. material balance calculations;
- c. emission factors from EPA's publication AP-42, Vol. I, adopted by reference in 18 AAC 50.035; or
- d. other methods and calculations approved by the Department.

[18 AAC 50.346(b)(1), 8/25/04; 18 AAC 50.326(a), 10/1/04; and 18 AAC 50.400 – 50.420, 1/18/97]
[40 C.F.R. 71.5(c)(3)(ii), 7/1/03]

- 2. Assessable Emissions Estimates.** Emission fees will be assessed as follows:

- 2.1 no later than March 31 of each year, the Permittee may submit an estimate of the stationary source's assessable emissions to ADEC, Air Permits Program, ATTN: Assessable Emissions Estimate, 410 Willoughby Ave., Juneau, AK 99801-1795; the submittal must include all of the assumptions and calculations used to estimate the assessable emissions in sufficient detail so the Department can verify the estimates; or
- 2.2 if no estimate is received on or before March 31 of each year, emission fees for the next fiscal year will be based on the potential to emit set out in condition 1.1.

[18 AAC 50.346(b)(1), 5/3/02; 18 AAC 50.326(a), 10/1/04; and 18 AAC 50.400 – 50.420, 1/18/97]
[40 C.F.R. 71.5(c)(3)(ii), 7/1/03]

Section 4. Emission Unit Inventory and Description

Emission units listed in Table 1 have specific monitoring, record keeping, or reporting conditions in this permit. Emission unit descriptions and ratings are given for identification purposes only.

Table 1 – Emission Unit Inventory

ID	Unit Name	Unit Description	Install Date	Rating/ Size
1	Diesel Generator	Caterpillar Model D-398, SN 66B04976	Pre 1986	500 kW
2	Diesel Generator	Caterpillar Model D-398, SN 67B1435	Pre 1986	500 kW
3	Diesel Generator	Caterpillar Model D-398, SN 66B06111	Pre 1986	500 kW
4	Diesel Generator	Caterpillar Model D-398, SN 67B1422	Pre 1986	500 kW
5	Diesel Generator	Caterpillar Model D-3606, SN 8RB00312	1987	1,500 kW
6	Diesel Generator	Caterpillar Model D-3608, SN 6MC00281	1990	2,000 kW
7	Steam Boiler	York Shipley Model SPH-350N5-153000, SN 77116660H70836	Pre 1986	350 bhp
8	Steam Boiler	Seattle Boiler Works Model HPFWB-1650 Four Pass Wet Back Boiler w/ ST Johnson Model FT98 Low NOx Burner, SN L90600	2000	9.7 MMBtu/hr
9	Steam Boiler	Seattle Boiler Works Model HPT-1650, SN L50972	1990	300 bhp
10	Steam Boiler	Kewanee Model H3S-200-GO6, SN R5801	1990	200 bhp
11	Fish Meal Drier	Sword Int'l Dyno Jet Hot Air Drier Model SIDJ-4.5 w/ Ray Rotary Burner Model BGE-700, SN 167225	1990	24.1 MMBtu/hr

[18 AAC 50.326(a), 10/1/04]
[40 C.F.R. 71.5(c)(3), 7/1/03]

Section 5. Emission Unit-Specific Requirements

Fuel Burning Equipment & Industrial Process Standards

- 3. Visible Emissions.** The Permittee shall not cause or allow visible emissions, excluding condensed water vapor, emitted from Unit IDs 1 through 11 to reduce visibility through the exhaust effluent by any of the following:

- a. More than 20 percent for more than three minutes in any one hour.¹

[18 AAC 50.055(a)(1), 1/18/97]
[40 C.F.R. 52.70, 7/1/03]

- b. More than 20 percent averaged over any six consecutive minutes.²

[18 AAC 50.055(a)(1), 5/3/02 & 18 AAC 50.346(c), 10/1/04]

- 3.1 Monitor, record and report according to Section 13.

[18 AAC 50.326(a), 10/1/04]
[40 C.F.R. 71.2 and 71.6(a)(3), 7/1/03]

- 4. Particulate Matter.** The Permittee shall not cause or allow particulate matter emitted from each Unit IDs 1 through 11 to exceed 0.05 grains per cubic foot of exhaust gas corrected to standard conditions and averaged over three hours.

[18 AAC 50.055(b)(1), 1/18/97 & 18 AAC 50.346(c), 10/1/04]

- 4.1 Monitor, record and report according to Section 13.

[18 AAC 50.326(a), 10/1/04]
[40 C.F.R. 71.2 and 71.6(a)(3), 7/1/03]

- 5. Sulfur Compound Emissions.** The Permittee shall not cause or allow sulfur compound emissions, expressed as SO₂, from Unit IDs 1 through 11 to exceed 500 ppm averaged over three hours.

[18 AAC 50.055(c), 1/18/97 & 18 AAC 50.346(c), 10/1/04]

- 5.1 Use fuel with a sulfur content no more than 0.1 percent by weight.

[Permit No. 9625-AA006, Condition 1 & Exhibit B, Part 1, 10/29/96]

- 5.2 Upon receiving a shipment of fuel, obtain a statement or receipt from the supplier showing the sulfur content of the shipment. If a statement is not available from the supplier, analyze a representative sample of the fuel to determine the sulfur content using an approved ASTM method such as ASTM D975-84, D3120-92, D4152-90, D2622-91 and ASTM 396-92.

¹ For purposes of this permit, the “more than three minutes in any one hour” criterion in this condition and condition 11 will no longer be effective when the revisions to 18 AAC 50 dated 5/3/02 are adopted by EPA.

² The six-minute average standard is enforceable only by the state until the revisions to 18 AAC 50 dated 5/3/02 are adopted into the State Implementation Plan (SIP), at which time it will also be federally enforceable.

5.3 Upon receiving a shipment of fuel, calculate the fuel sulfur content of the stored fuel in the tanks at the stationary source, as follows:

- a. Before loading fuel into a storage tank, measure and record the quantity of fuel (V_T) remaining in the storage tank.
- b. Record the amount of fuel received in the shipment (V_S).

5.4 Calculate and record the average sulfur content of the fuel in the tank using the following equation:

$$Wt \% S = \frac{[(S_S \times V_S) + (S_T \times V_T)]}{(V_S + V_T)}$$

where:

Wt % S = the average sulfur content of the stored fuel after delivery.

V_T = gallons of fuel in tank before delivery (recorded under condition 5.3).

S_S = sulfur content of the fuel delivery (recorded under condition 5.2 or 9.1).

V_S = gallons of fuel delivered (recorded under condition 5.3a).

S_T = sulfur content of fuel in tank before delivery (from previous calculation).

5.5 Report in accordance with condition 38 whenever the fuel sulfur content calculated in condition 5.4 does not meet the requirements of condition 5.1. When reporting under this condition, include a calculation of the sulfur compound emissions, in ppm, expected to result from burning this fuel using the equations in Section 15 with the sulfur content from condition 5.4.

5.6 Include in the Operating Report required by condition 39:

- a. a list of the sulfur content of each shipment of fuel received at the stationary source during the reporting period, and
- b. a list of the sulfur content in the tank after each shipment determined under condition 5.5.

[18 AAC 50.326(a), 10/1/04]
[40 C.F.R. 71.2 and 71.6(a)(1 & 3), 7/1/03]

Section 6. Stationary Source-Wide Requirements

- 6. NOx PSD Avoidance Limits.** The Permittee shall not allow the engines (Unit IDs 1 - 4, 5, and 6, combined, shown in Table 1) to emit more than 273 tons of NOx per 12 consecutive months, and shall not allow the boilers and dryer (Unit IDs 7, 8, 9, 10, and 11 combined, shown in Table 1) to emit more than 19.2 tons of NOx per 12 consecutive months.

[Construction Permit No. 241CP03, date]
[18 AAC 50.326(a), 10/1/04]
[40 C.F.R. 71.2 and 71.6(a)(1 & 3), 7/1/03]

- 6.1 Track fuel consumption for each of Unit IDs 1 through 11, shown in Table 1, using either condition 6.1a or 6.1b.
- Maintain and operate in good working order a continuous system for recording and monitoring all fuels consumed in each unit. Calculate and record the total fuel consumed in each of Unit IDs 1 through 11 each month at a consistent time.
 - Record hours of operation daily, and calculate and record all fuels consumed in each of Unit IDs 1 through 11 each month using hours of operation and maximum fuel consumption rates shown in Table 2.

Table 2 - Maximum Fuel Consumption Rates

Unit ID	Maximum Fuel Consumption Rate (gal/hr)
1 – 4	56.5 for each unit
5	91.8
6	125.4
7	106.9
8	71
9	91.6
10	50.9
11	175

- 6.2 For Unit IDs 1 through 6:

- Do not exceed a CET fuel limit of 1,440,700 gallons per 12 consecutive months. By the 15th of each month, calculate the CET for the engines using Equation 1.

Equation 1: $CET = (0.528)G_{1-4} + (1.755)G_5 + (1.873)G_6$

where:

G_{1-4} = Preceding 12 month rolling total fuel burned in Unit IDs 1 – 4, gallons

G_5 = Preceding 12 month rolling total fuel burned in Unit ID 5, gallons
 G_6 = Preceding 12 month rolling total fuel burned in Unit ID 6, gallons

- b. By the 15th of each month, calculate and record 12 month rolling total NOx emissions for the previous 12 months using Equation 2.

Equation 2: $Emissions (tpy) = \left[\frac{(0.200)G_{1-4} + (0.665)G_5 + (0.710)G_6}{2000} \right]$

where:

G_{1-4} = Preceding 12 month rolling total fuel burned in Unit IDs 1 – 4, gallons
 G_5 = Preceding 12 month rolling total fuel burned in Unit ID 5, gallons
 G_6 = Preceding 12 month rolling total fuel burned in Unit ID 6, gallons

- c. Report as set out by condition 38 any time the CET calculated in condition 6.2a exceeds the CET fuel limit in condition 6.2a, or any time the total emissions calculated in condition 6.2b exceeds the limit for the engines in condition 6.
- d. Include the records required under conditions 6.2a and 6.2b with the Operating Report required by condition 39.

6.3 For Unit IDs 7 through 11:

- a. Do not exceed a CET fuel limit of 1,637,228 gallons per 12 consecutive months. By the 15th of each month calculate the CET for the boilers and fishmeal dryer using Equation 3:

Equation 3: $CET = (1.279)G_7 + (0.597)G_8 + (1.705)G_9 + (1.151)G_{10} + (0.981)G_{11}$

where:

G_7 = Preceding 12 month rolling total fuel burned in Unit ID 7, gallons
 G_8 = Preceding 12 month rolling total fuel burned in Unit ID 8, gallons
 G_9 = Preceding 12 month rolling total fuel burned in Unit ID 9, gallons
 G_{10} = Preceding 12 month rolling total fuel burned in Unit ID 10, gallons
 G_{11} = Preceding 12 month rolling total fuel burned in Unit ID 11, gallons

- b. By the 15th of each month, calculate and record 12 month rolling total NOx emissions for the previous 12 months using Equation 4.

Equation 4: $Emissions (tpy) = \left[\frac{(0.030)G_7 + (0.014)G_8 + (0.040)G_9 + (0.027)G_{10} + (0.023)G_{11}}{2000} \right]$

where:

G_7 = Preceding 12 month rolling total fuel burned in Unit ID 7, gallons
 G_8 = Preceding 12 month rolling total fuel burned in Unit ID 8, gallons
 G_9 = Preceding 12 month rolling total fuel burned in Unit ID 9, gallons

G_{10} = Preceding 12 month rolling total fuel burned in Unit ID 10, gallons
 G_{11} = Preceding 12 month rolling total fuel burned in Unit ID 11, gallons

- c. Report as set out by condition 38 any time the CET calculated in condition 6.3a exceeds the CET fuel limit in condition 6.3a or any time the total emissions calculated in condition 6.3b exceed the limit for the boilers in condition 6.
- d. Include the records required under conditions 6.3a and 6.3b with the Operating Report required by condition 39.

[Construction Permit No. 241CP03, date]
[18 AAC 50.326(a), 10/1/04]
[40 C.F.R. 71.2 and 71.6(a)(1 & 3), 7/1/03]

7. Limits to Ensure Compliance with State Ambient Air Quality Standard and Increment for NO₂. The Permittee shall not allow the stationary source to cause a violation of the state ambient air quality standard and increment for NO₂.

7.1 Limit the total amount of all fuels burned in Unit IDs 1 through 6, combined, to less than 1,440,700 gallons per 12 consecutive months.

- a. By the 15th of each month, calculate and record the 12-month rolling total fuel burned in Unit IDs 1 through 6 for the previous 12 months, in gallons, as set out by condition 6.1.
- b. Report as set out by condition 38 any time the 12-month total exceeds the limit in condition 7.1.
- c. Include the records required under condition 7.1a with the Operating Report required by condition 39.

7.2 Limit the total amount of all fuels burned in Unit IDs 7 through 11, combined, to less than 1,637,228 gallons per 12 consecutive months.

- a. By the 15th of each month, calculate and record the 12 month rolling total fuel burned in Unit IDs 7 through 11 for the previous 12 months, in gallons, as set out by condition 6.1.
- b. Report as set out by condition 38 any time the 12-month total exceeds the limit in condition 7.2.
- c. Include the records required under condition 7.2a with the Operating Report required by condition 39.

[18 AAC 50.010(2) & 50.020, 10/01/04]
[Construction Permit No. 241CP03, date]
[18 AAC 50.326(a), 10/1/04]
[40 C.F.R. 71.2 and 71.6(a)(1 & 3), 7/1/03]

8. Limit to Protect SO₂ Ambient Air Quality Standards and Increments. Permittee shall not allow the stationary source to cause a violation of the state ambient air quality standard and increment for SO₂.

- 8.1 Do not burn more than 3,077,928 gallons during any 12 consecutive months in Unit IDs 1 through 11.
- a. Track fuel consumption as required under conditions 6.1, 7.1a, and 7.2a.
 - b. Report as set out by condition 38 any time the 12-month total exceeds the limit in condition 8.
 - c. Include the records required under condition 8.1a with the Operating Report required by condition 39.
- 8.2 Use fuel with a sulfur content no more than 0.1 percent by weight.
- a. Monitor, record, and report in accordance with condition 5.

[Permit No. 9625-AA006, Exhibit B Part I & Condition 1, 10/29/96]

[Construction Permit No. 241CP02, Condition III, 11/26/02]

[18 AAC 50.326(a), 10/1/04]

[40 C.F.R. 71.2 and 71.6(a)(1 & 3), 7/1/03]

9. Used Oil. The Permittee may burn used oil blends in the boilers, Unit IDs 7 through 10, as follows³:

- 9.1 Analyze each batch of used oil to determine the sulfur content using an approved ASTM method such as ASTM D975-84, D3120-92, D4152-90, D2622-91 and ASTM 396-92. Maintain records showing the results of each analysis.
- 9.2 Blend the used oil with virgin oil at a ratio that will ensure compliance with the sulfur limit of condition 5.1. However, the used oil blend shall be mixed at a ratio of no more than 1 part used oil with 6 parts virgin oil, unless the Permittee provides a Department approved demonstration that a greater ratio will comply with the limit in condition 4.
- 9.3 Account for the consumption of the used oil blend as set out according to conditions 6 through 8.

³ CAUTION! Although this condition should ensure compliance with the applicable emission standards of 18 AAC 50, this permit does NOT ensure compliance with other applicable state or federal laws concerning management, use, or disposal of used oil.

- 9.4 Include with the Operating Report required by condition 39:
- a. Results of each analysis as set out by condition 9.1; and
 - b. For each batch of used oil blended, the amounts of virgin oil and used oil; the blend ratio; and the final sulfur content.
- 9.5 Report as set out by condition 38 any time the blend ratio or other requirements deviate from conditions 9.1 to 9.4.

[18 AAC 50.326(a), 10/1/04]
[40 C.F.R. 71.2 and 71.6(a)(1 & 3), 7/1/03]
[Permit No. 9625-AA006, Exhibit B Part I, Section 3, 10/29/96]

Section 7. Insignificant Units

This section contains the requirements that the Permittee identified under 18 AAC 50.326(d)(2) as applicable to insignificant emission units at the stationary source. This section also specifies the testing, monitoring, recordkeeping, and reporting for insignificant emission units that the Department finds necessary to ensure compliance with the applicable requirements. Insignificant emission units are not exempted from any air quality control requirement or federally enforceable requirement.

- 10.** For emission units at the stationary source that are insignificant as defined in 18 AAC 50.326(d)-(i) that are not listed in this permit, the following apply:
 - 10.1 The Permittee shall submit the compliance certifications of condition 41 based on reasonable inquiry;
 - 10.2 The Permittee shall comply with the requirements of condition 21;
 - 10.3 The Permittee shall report in the Operating Report required by condition 39 if an emission unit is insignificant because of actual emissions less than the thresholds of 18 AAC 50.326(e) and actual emissions become greater than any of those thresholds;
 - 10.4 No other monitoring, recordkeeping or reporting is required.
[18 AAC 50.346(b)(4), 10/1/04]
- 11.** The Permittee shall not cause or allow visible emissions, excluding condensed water vapor, emitted from an industrial process, fuel-burning equipment, or an incinerator to reduce visibility through the exhaust effluent by any of the following:
 - 11.1 more than 20 percent for a total of more than three minutes in any one hour⁴;
[18 AAC 50.050(a)(2) & 50.055(a)(1), 1/18/97]
[40 C.F.R. 52.70, 7/01/03]
 - 11.2 more than 20 percent averaged over any six consecutive minutes⁵.
[18 AAC 50.055(a)(1), 5/03/02]
- 12.** The Permittee shall not cause or allow particulate matter emitted from an industrial process or fuel-burning equipment to exceed 0.05 grains per cubic foot of exhaust gas corrected to standard conditions and averaged over three hours.
[18 AAC 50.055(b)(1), 1/18/97]
- 13.** The Permittee shall not cause or allow sulfur compound emissions, expressed as SO₂, from an industrial process or fuel-burning equipment, to exceed 500 ppm averaged over three hours.
[18 AAC 50.055(c), 1/18/97]

⁴ See Footnote 1.

⁵ See Footnote 2.

Section 8. Generally Applicable Requirements

- 14. Asbestos NESHAP.** When conducting demolition or renovation at the stationary source, Permittee shall comply with the requirements set forth in 40 C.F.R. §61.145, §61.150, and §61.152, and the applicable sections set forth in 40 C.F.R. §61, Subpart A and Appendix A.

[18 AAC 50.040(b)(2)(F), 10/1/04]
[40 C.F.R. 61, Subparts A & M, and Appendix A, 7/1/03]

- 15. Refrigerant Recycling and Disposal.** The Permittee shall comply with the standards for recycling and emission reduction of refrigerants set forth in 40 C.F.R. §82, Subpart F, as follows:

15.1 Comply with 40 C.F.R. 82.154 - Prohibitions, except for section (c);

15.2 Comply with 40 C.F.R. 82 - Required practices;

15.3 Allow only certified technicians to service equipment; and

15.4 If the unit contains 50 or more pounds of refrigerant:

- a. Ensure that any persons servicing the unit provide the owner with an invoice or other documentation indicating the amount of refrigerant added to the unit, and
- b. Keep servicing records documenting the date and type of service as well as the quantity of refrigerant added. Keep records of refrigerant purchased and added to such units in cases where the Permittee adds his own refrigerant. Indicate date(s) when refrigerant added.

[18 AAC 50.040(d), 10/1/04]
[40 C.F.R. 82, Subpart F, 7/1/03]

- 16. Good Air Pollution Control Practice.** The Permittee shall do the following for emission Unit IDs 1 through 11:

16.1 perform regular maintenance considering the manufacturer's or the operator's maintenance procedures;

16.2 keep records of any maintenance that would have a significant effect on emissions; the records may be kept in electronic format; and

16.3 keep a copy of either the manufacturer's or the operator's maintenance procedures.

[18 AAC 50.030, 50.346(b)(5), & 50.326(j)(5), 10/1/04]

- 17. Dilution.** The Permittee shall not dilute emissions with air to comply with this permit.

[18 AAC 50.045(a) 1/18/97]

17.1 Check all ductwork and exhaust systems for leaks, and repair any leaks found, immediately before conducting a source test to demonstrate compliance with this permit.

17.2 Keep records of all inspections and repairs performed under this condition.

17.3 Upon request of the Department, submit copies of the records.

[18 AAC 50.326(a), 10/1/04]

18. Reasonable Precautions to Prevent Fugitive Dust. A person who causes or permits bulk materials to be handled, transported, or stored, or who engages in an industrial activity or construction project shall take reasonable precautions to prevent particulate matter from being emitted into the ambient air.

18.1 The Permittee shall keep records of:

- a. complaints received by the Permittee and complaints received by the Department and conveyed to the Permittee; and
- b. any additional precautions that are taken:
 - (i) to address complaints described in condition 18.1a or to address the results of Department inspections that found potential problems; and
 - (ii) to prevent future dust problems.

18.2 The Permittee shall report according to condition 21.

[18 AAC 50.346(c), 50.045(d), & 50.040(e), 10/1/04]

19. Stack Injection. The Permittee shall not release materials other than process emissions, products of combustion, or materials introduced to control pollutant emissions from a stack at a source constructed or modified after November 1, 1982, unless approved in writing by the Department.

[18 AAC 50.055(g), 10/1/04]

20. Open Burning. The Permittee shall comply with the following requirements when conducting open burning at the stationary source:

20.1 Open burning of asphalts, rubber products, plastics, tars, oils, oily wastes, contaminated oil cleanup materials, or other materials in a way that gives off black smoke is prohibited without written approval of the Department in accordance with the procedures set forth in 18 AAC 50.065.

- 20.2 Open burning or incineration of pesticides, halogenated organic compounds, cyanic compounds, or polyurethane products in a way that gives off black smoke or acidic gases or particulate matter is prohibited.
- 20.3 Open burning of putrescible garbage, animal carcasses, or petroleum-based materials, including materials contaminated with petroleum or petroleum derivatives, is prohibited if it causes odor or black smoke that has an adverse effect on nearby persons or property.
- 20.4 Open burning is prohibited in an area if the Department declares an air quality advisory under 18 AAC 50.245, stating that open burning is not permitted in that area for the day.
- 20.5 When conducting open burning, the Permittee shall ensure that
- The material is kept as dry as possible through the use of cover or dry storage;
 - Before igniting the burn, noncombustibles are separated to the greatest extent practicable;
 - Natural or artificially induced draft is present;
 - To the greatest extent practicable, combustibles are separated from grass or peat layer;
 - Combustibles are not allowed to smolder; and
 - Sufficient written records are kept to demonstrate that the Permittee complies with the limitations in this condition. Upon request of the Department, submit copies of the records.

[18 AAC 50.040(e), 10/1/04; 18 AAC 50.065, 7/21/01]

- 21. Air Pollution Prohibited.** No person may permit any emission which is injurious to human health or welfare, animal or plant life, or property, or which would unreasonably interfere with the enjoyment of life or property.

[18 AAC 50.110, 5/26/72; 18 AAC 50.040(e) & 50.346(a), 10/1/04]

- 21.1 If emissions present a potential threat to human health or safety, the Permittee shall report any such emissions according to condition 38.
- 21.2 As soon as practicable after becoming aware of a complaint that is attributable to emissions from the stationary source, the Permittee shall investigate the complaint to identify emissions that the Permittee believes have caused or are causing a violation of condition 21.
- 21.3 The Permittee shall initiate and complete corrective action necessary to eliminate any violation identified by a complaint or investigation as soon as practicable if

- a. after an investigation because of a complaint or other reason, the Permittee believes that emissions from the stationary source have caused or are causing a violation of condition 21; or
- b. the Department notifies the Permittee that it has found a violation of condition 21.

21.4 The Permittee shall keep records of:

- a. the date, time, and nature of all emissions complaints received;
- b. the name of the person or persons that complained, if known;
- c. a summary of any investigation, including reasons the Permittee does or does not believe the emissions have caused a violation of condition 21; and
- d. any corrective actions taken or planned for complaints attributable to emissions from the stationary source.

21.5 With each stationary source Operating Report under condition 39, the Permittee shall include a brief summary report which must include:

- a. the number of complaints received;
- b. the number of times the Permittee or the Department found corrective action necessary;
- c. the number of times action was taken on a complaint within 24 hours; and
- d. the status of corrective actions the Permittee or Department found necessary that were not taken within 24 hours.

21.6 The Permittee shall notify the Department of a complaint that is attributable to emissions from the stationary source within 24 hours after receiving the complaint, unless the Permittee has initiated corrective action within 24 hours of receiving the complaint.

[18 AAC 50.346(a) & 50.326(a), 10/1/04]
[40 C.F.R. 71.6(a)(3), 7/1/03]

- 22. Technology-Based Emission Standard.** If an unavoidable emergency, malfunction, or non-routine repair, as defined in 18 AAC 50.235, causes emissions in excess of a technology-based emission standard⁶, the Permittee shall take all reasonable steps to minimize levels of emissions that exceed the standard. Excess emissions reporting under condition 38 requires information on the steps taken to minimize emissions. Monitoring of compliance for this condition consists of the report required under condition 38.

[18 AAC 50.235(a) & 50.326(j)(5), 10/1/04]

- 23. Permit Renewal.** To renew this permit, the Permittee shall submit a complete application under 18 AAC 50.326(a) no sooner than **date** and no later than **date**.

[18 AAC 50.326(j)(2), 10/1/04]

⁶ *Technology-based emission standard* means a best available control technology standard (BACT); a lowest achievable emission rate standard (LAER); a maximum achievable control technology standard established under 40 C.F.R. 63, Subpart B, adopted by reference in 18 AAC 50.040(c); a standard adopted by reference in 18 AAC 50.040(a) or (c); and any other similar standard for which the stringency of the standard is based on determinations of what is technologically feasible, considering relevant factors.

Section 9. General Source Testing and Monitoring Requirements

- 24. Requested Source Tests.** In addition to any source testing explicitly required by this permit, the Permittee shall conduct source testing as requested by the Department to determine compliance with applicable permit requirements.

[18 AAC 50.220(a), 1/18/97 & 18 AAC 50.345(a) & (k), 5/03/02]

- 25. Operating Conditions.** Unless otherwise specified by an applicable requirement or test method, the Permittee shall conduct source testing

25.1 At a point or points that characterize the actual discharge to into the ambient air; and

25.2 At the maximum rated burning or operating capacity of the unit or another rate determined by the Department to characterize the actual discharge into the ambient air.

[18 AAC 50.220(b), 1/18/97]

- 26. Reference Test Methods.** The Permittee shall use the following as reference test methods when conducting source testing for compliance with this permit:

26.1 Source testing for compliance with requirements adopted by reference in 18 AAC 50.040(a) must be conducted in accordance with the methods and procedures specified in 40 C.F.R. §60.

[18 AAC 50.220(c)(1)(A), 1/18/97 & 18 AAC 50.040(a), 10/1/04]
[40 C.F.R. 60, 7/1/03]

26.2 Source testing for compliance with requirements adopted by reference in 18 AAC 50.040(b) must be conducted in accordance with the methods and procedures specified in 40 C.F.R. §61.

[18 AAC 50.040(b), 10/1/04 & 18 AAC 50.220(c)(1)(B), 1/18/97]
[40 C.F.R. 61, 7/1/03]

26.3 Source testing for compliance with requirements adopted by reference in 18 AAC 50.040(c) must be conducted in accordance with the source test methods and procedures specified in 40 C.F.R. §63.

[18 AAC 50.040(c), 10/1/04 & 18 AAC 50.220(c)(1)(C), 1/18/97]
[40 C.F.R. 63, 7/1/03]

26.4 Source testing for the reduction in visibility through the exhaust effluent must be conducted in accordance with the procedures set out in Section 14 of this permit.

[18 AAC 50.030, 10/1/04 & 18 AAC 50.220(c)(1)(D), 1/18/97]

26.5 Source testing for emissions of particulate matter, sulfur compounds, nitrogen compounds, carbon monoxide, lead, volatile organic compounds, fluorides, sulfuric acid mist, municipal waste combustor organics, metals, and acid gases must be conducted in accordance with the methods and procedures specified 40 C.F.R. §60, Appendix A.

[18 AAC 50.040(a)(4), 10/1/04; & 18 AAC 50.220(c)(1)(E), 1/18/97]

[40 C.F.R. 60, Appendix A, 7/1/03]

26.6 Source testing for emissions of PM-10 must be conducted in accordance with the procedures specified in 40 C.F.R. §51, Appendix M.

[18 AAC 50.035(b)(2), 10/1/04; & 18 AAC 50.220(c)(1)(F), 1/18/97]
[40 C.F.R. 51, Appendix M, 7/1/03]

26.7 Source testing for emissions of any contaminant may be determined using an alternative method approved by the Department in accordance with Method 301 in Appendix A to 40 C.F.R. §63.

[18 AAC 50.040(c)(19), 10/1/04 & 18 AAC 50.220(c)(2), 1/18/97]
[40 C.F.R. 63, Appendix A, Method 301, 7/1/03]

27. **Excess Air Requirements.** To determine compliance with this permit, standard exhaust gas volumes must only include the volume of gases formed from the theoretical combustion of fuel, plus the excess air volume normal for the specific source type, corrected to standard conditions (dry gas at 68°F and an absolute pressure of 760 millimeters of mercury).

[18 AAC 50.220(c)(3), 1/18/97; & 18 AAC 50.990(102), 10/1/04]

28. **Test Exemption.** The Permittee is not required to comply with conditions 30, 31, or 32 when the exhaust is observed for visible emissions by Method 9 Plan or Smoke/No Smoke Plan.

[18 AAC 50.345(a), 5/03/02]

29. **Test Deadline Extension.** The Permittee may request an extension to a source test deadline established by the Department. The Permittee may delay a source test beyond the original deadline only if the extension is approved in writing by the Department's appropriate division director or designee.

[18 AAC 50.345(a) & (l), 5/03/02]

30. **Test Plans.** Before conducting any source tests, the Permittee shall submit a plan to the Department. The plan must include the methods and procedures to be used for sampling, testing, and quality assurance, and must specify how the source will operate during the test and how the Permittee will document this operation. A complete plan must be submitted within 60 days of receiving a request under conditions 24 and at least 30 days before the scheduled date of any tests.

[18 AAC 50.345(a) & (m), 5/03/02]

31. **Test Notification.** At least 10 days before conducting a source test, the Permittee shall give the Department written notice of the date and time the source test will begin.

[18 AAC 50.345(a) & (n), 5/03/02]

32. **Test Reports.** Within 45 days after completing a source test, the Permittee shall submit two copies of the results, to the extent practical, in the format set out in the *Source Test Report Outline* of Volume III, Section IV.3 of the State Air Quality Control Plan, adopted by reference in 18 AAC 50.030(8). The Permittee shall certify the results as set out in condition 34 of this permit.

[18 AAC 50.345(a) & (o), 5/03/02]

- 33. Particulate Matter Calculations.** If source testing is required for compliance with the particulate matter standards in conditions 4 and 12, the three-hour average is determined using the average of three one-hour test runs. The source testing must account for those emissions caused by soot blowing, grate cleaning, or other routine maintenance activities by ensuring that at least one test run includes the emissions caused by the routine maintenance activity and is conducted under conditions that lead to representative emissions from the activity. The emissions must be quantified using the following equation:

$$E = E_m \left[(A + B) \times \frac{S}{R \times A} \right] + E_{nm} \left[\frac{(R - S)}{R} - \frac{B \times S}{R \times A} \right]$$

where:

E = the total particulate matter emissions of the source in grains per dry standard cubic foot (gr./dscf).

E_M = the particulate matter emissions in gr./dscf measured during the test that included the routine maintenance activity.

E_{NM} = the arithmetic average of particulate emissions in gr./dscf measured during by the test runs that did not include the maintenance activity.

A = the period of routine maintenance activity occurring during the test run that included routine maintenance activity, expressed to the nearest hundredth of an hour.

B = the total period of the test run, less A.

R = the maximum period of source operation per 24 hours, expressed to the nearest hundredth of an hour.

S = the maximum period of routine maintenance activity per 24 hours, expressed to the nearest hundredth of an hour.

[18 AAC 50.220(f), 1/18/97]

Section 10. General Recordkeeping, Reporting, and Compliance Certification Requirements

- 34. Certification.** The Permittee shall certify all reports, compliance certifications, or other documents submitted to the Department and required under the permit by including the signature of a responsible official for the permitted stationary source following the statement: "Based on information and belief formed after reasonable inquiry, I certify that the statements and information in and attached to this document are true, accurate, and complete." Excess emission reports must be certified either upon submittal or with an Operating Report required for the same reporting period. All other reports and other documents must be certified upon submittal. When certifying a compliance certification, the official's signature must be notarized.

[18 AAC 50.345(a) & (j), 5/3/02; 18 AAC 50.205 & 50.326(a), 10/1/04]
[40 C.F.R. 71.6(a)(3)(iii)(A), 7/1/03]

- 35. Submittals.** Unless otherwise directed by the Department or this permit, the Permittee shall send two copies of reports, compliance certifications, and other submittals required by this permit to ADEC, Air Permits Program, 610 University Ave., Fairbanks, AK 99709-3643, ATTN: Compliance Technician. The Permittee may, upon consultation with the Compliance Technician regarding software compatibility, provide electronic copies of data reports, emission source test reports, or other records under a cover letter certified in accordance with condition 34.

[18 AAC 50.326(a), 10/1/04]
[40 C.F.R. 71.6(a)(3)(iii)(A), 7/1/03]

- 36. Information Requests.** The Permittee shall furnish to the Department, within a reasonable time, any information the Department requests in writing to determine whether cause exists to modify, revoke and reissue, or terminate the permit or to determine compliance with the permit. Upon request, the Permittee shall furnish to the Department copies of records required to be kept by this permit. The Department, in its discretion, will require the Permittee to furnish copies of those records directly to the federal administrator.

[18 AAC 50.345(a) & (i), 5/3/02; 18 AAC 50.200 & 50.326(a), 10/1/04]
[40 C.F.R. 71.5(a)(2) & 71.6(a)(3), 7/1/03]

- 37. Recordkeeping Requirements.** The Permittee shall keep all records required by this permit for at least five years after the date of collection, including

- 37.1 Copies of all reports and certifications submitted pursuant to this Section of this permit.
- 37.2 Records of all monitoring required by this permit, and information about the monitoring including
 - a. calibration and maintenance records, original strip chart or computer-based recordings for continuous monitoring instrumentation;
 - b. sampling dates and times of sampling and measurements;

- c. the operating conditions that existed at the time of sampling or measurement;
- d. the date analyses were performed;
- e. the location where samples were taken;
- f. the company or entity that performed the sampling and analyses;
- g. the analytical techniques or methods used in the analyses; and
- h. the results of the analyses.

[18 AAC 50.326(a), 10/1/04]
[40 C.F.R. 60.7(f), Subpart A and §71.6(a)(3)(ii)(B), 7/1/03]

38. Excess Emission and Permit Deviation Reports.

38.1 Except as provided in condition 21, the Permittee shall report all emissions or operations that exceed or deviate from the requirements of this permit as follows:

- a. in accordance with 18 AAC 50.240(c), as soon as possible after the event commenced or is discovered, report
 - (i) emissions that present a potential threat to human health or safety; and
 - (ii) excess emissions that the Permittee believes to be unavoidable;
- b. in accordance with 18 AAC 50.235(a), within two working days after the event commenced or was discovered, report an unavoidable emergency, malfunction, or nonroutine repair that causes emissions in excess of a technology based emission standard;
- c. report all other excess emissions and permit deviations
 - (i) within 30 days of the end of the month in which the emissions or deviation occurs or is discovered, except as provided in condition 38.1c(ii) or 38.1c(iii);
 - (ii) if a continuous or recurring excess emissions is not corrected within 48 hours of discovery, within 72 hours of discovery unless the Department provides written permission to report under condition 38.1c(i); and
 - (iii) for failure to monitor, as required by other applicable conditions in this permit.

38.2 The Permittee must report using either the Department's on-line form, or if the Permittee prefers, the form contained in Section 15 of this permit. The Permittee must provide all information called for by the form that is used.

38.3 If requested by the Department, the Permittee shall provide a more detailed written report as requested to follow up an excess emissions report.

[18 AAC 50.235(a)(2), 50.240(c), & 50.326(j)(3), & 50.346(b)(2), 10/1/04]

39. NSPS and NESHAP Reports. The Permittee shall:

39.1 attach to the stationary source Operating Report required by condition 40, copies of any NSPS and NESHAPs reports submitted to the U.S. Environmental Protection Agency (EPA) Region, and

39.2 upon request by the Department, notify and provide a written copy of any EPA-granted waiver of the federal emission standards, record keeping, monitoring, performance testing, or reporting requirements, or approved custom monitoring schedules.

[18 AAC 50.040 & 18 AAC 50.326(a), 10/1/04]
[40 C.F.R. 60 & 61, and §71.6(a)(3)(iii), 7/1/03]

40. Operating Reports. During the life of this permit, the Permittee shall submit an original and two copies of an operating report by August 1 for the period January 1 to June 30 of the current year and by February 1 for the period July 1 to December 31 of the previous year.

40.1 The operating report must include all information required to be in operating reports by other conditions of this permit.

40.2 If excess emissions or permit deviations that occurred during the reporting period are not reported under condition 40.1, either

a. the Permittee shall identify

(i) the date of the deviation;

(ii) the equipment involved;

(iii) the permit condition affected;

(iv) a description of the excess emissions or permit deviation; and

(v) any corrective action or preventive measures taken and the date or dates of such actions; or

b. when excess emissions or permit deviations have already been reported under condition 38, the Permittee may cite the date or dates of those reports.

40.3 The operating report must include a listing of emissions monitored under condition(s) 49.1e and 49.2c which trigger additional testing or monitoring, and whether or not the emissions monitored exceed an emission standard. The Permittee shall include in the report:

- a. the date of the emissions;
- b. the equipment involved;
- c. the permit condition affected; and
- d. the monitoring result which triggered the additional monitoring.

[18 AAC 50.346(b)(6) & 50.326(a), 10/1/04]

[40 C.F.R. 71.6(a)(3)(iii)(A), 7/1/03]

41. Annual Compliance Certification. Each year by March 31, the Permittee shall compile and submit to the Department one original and one copy of an annual compliance certification report as follows:

[18 AAC 50.326(a), 10/1/04]

[40 C.F.R. 71.6(c)(5), 7/1/03]

41.1 For each permit term and condition set forth in Section 5 through Section 10, including terms and conditions for monitoring, reporting, and recordkeeping:

- a. certify the compliance status over the preceding calendar year consistent with the monitoring required by this permit;
- b. state whether compliance is intermittent or continuous;
- c. briefly describe each method used to determine the compliance status; and
- d. notarize the responsible official's signature.

[18 AAC 50.205, 10/1/04 & 50.345(a) & (j), 5/03/02]

41.2 In addition, submit a copy of the report directly to the EPA-Region 10, Office of Air Quality, M/S OAQ-107, 1200 Sixth Avenue, Seattle, WA 98101.

Section 11. Standard Conditions Not Otherwise Included in the Permit

- 42.** The Permittee must comply with each permit term and condition. Noncompliance with a permit term or condition constitutes a violation of AS 46.14, 18 AAC 50, and, except for those terms or conditions designated in the permit as not federally enforceable, the Clean Air Act, and is grounds for

42.1 an enforcement action;

42.2 permit termination, revocation and reissuance, or modification in accordance with AS 46.14.280; or

42.3 denial of an operating-permit renewal application.

[18 AAC 50.345(a) & (c), 5/03/02]

- 43.** It is not a defense in an enforcement action to claim that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with a permit term or condition.

[18 AAC 50.345(a) & (d), 5/03/02]

- 44.** Each permit term and condition is independent of the permit as a whole and remains valid regardless of a challenge to any other part of the permit.

[18 AAC 50.345(a) & (e), 5/03/02]

- 45.** Compliance with permit terms and conditions is considered to be compliance with those requirements that are

45.1 included and specifically identified in the permit; or

45.2 determined in writing in the permit to be inapplicable.

[18 AAC 50.345(a) & (b), 5/03/02]

- 46.** The permit may be modified, reopened, revoked and reissued, or terminated for cause. A request by the Permittee for modification, revocation and reissuance, or termination or a notification of planned changes or anticipated noncompliance does not stay any permit condition.

[18 AAC 50.345(a) & (f), 5/03/02]

- 47.** The permit does not convey any property rights of any sort, nor any exclusive privilege.

[18 AAC 50.345(a) & (g), 5/03/02]

- 48.** The Permittee shall allow the Department or an inspector authorized by the Department, upon presentation of credentials and at reasonable times with the consent of the owner or operator to

48.1 enter upon the premises where a emission unit subject to the permit is located or where records required by the permit are kept;

- 48.2 have access to and copy any records required by the permit;
- 48.3 inspect any stationary source, equipment, practices, or operations regulated by or referenced in the permit; and
- 48.4 sample or monitor substances or parameters to assure compliance with the permit or other applicable requirements.

[18 AAC 50.345(a) & (h), 5/03/02]

Section 12. Permit As Shield from Inapplicable Requirements

In accordance with AS 46.14.290, this section of the permit contains the requirements determined by the Department not to be applicable to the permitted stationary source.

Table 3 - Alyeska Seafoods, Inc. Unalaska Processing Facility Permit Shield

Citation	Description	Justification
40 C.F.R. 60 Subpart Dc	Standards of Performance for Small Industrial-Commercial-Institutional Steam Generating Units	Emission units 7, 9, and 10 commenced construction prior to June 9, 1989 and emission unit no. 8 and 10 have maximum design heat input capacities less than 10 MMBtu/hr
40 C.F.R. 60 Subpart K	Standards of Performance for Storage Vessels for Petroleum Liquids for Which Construction, Reconstruction or Modification Commenced after June 11, 1973 and Prior to May 19, 1978	Storage tanks 12 and 13 have a capacities less than 40,000 gallons
40 C.F.R. 60 Subpart Ka	Standards of Performance for Storage Vessels for Petroleum Liquids for Which Construction, Reconstruction or Modification Commenced after May 18, 1978 and prior to July 23, 1984	Storage tanks 12 and 13 have a capacities less than 40,000 gallons
40 C.F.R. 60 Subpart Kb	Standards of Performance for Volatile Organic Liquid Storage Vessels for which Construction, Reconstruction or Modification Commences after July 23 1984	Effective October 15, 2003, the Subpart does not apply to storage vessels with a capacity greater than 19,813 gallons but less than 39,890 gallons storing liquid with true vapor pressure less than 15.0 kPa, effective October 15, 2003
40 C.F.R. 82.158 and 40 C.F.R. 82.160	Protection of Stratospheric Ozone - Recycling and Emissions Reduction - standards for recycling and recovery equipment and approved equipment testing organizations	The stationary source does not manufacture or import recycling and recovery equipment and is not a refrigeration equipment testing organization

[18 AAC 50.326(a), 10/1/04]
[40 C.F.R. 71.6(f)(1)(ii), 7/1/03]

Section 13. Visible Emissions and Particulate Matter Monitoring Plan

49. Visible Emissions Monitoring. The Permittee shall observe the exhaust of Unit IDs 1 through 11 for visible emissions using either the Method 9 Plan under condition 49.1 or the Smoke/No-Smoke Plan under condition 49.2. The Permittee may change visible-emissions plans for an emission unit at any time unless prohibited from doing so by condition 49.3.

49.1 Method 9 Plan. For all 18-minute observations in this plan, observe exhaust, following 40 C.F.R. 60, Appendix A-4, Method 9, adopted by reference in 18 AAC 50.040(a), for 18 minutes to obtain 72 consecutive 15-second opacity observations.

- a. First Method 9 Observation. Observe exhaust for 18 minutes within 14 calendar days after changing from the Smoke/No-Smoke Plan of condition 49.2.
- b. Monthly Method 9 Observations. After the first Method 9 observation, perform 18-minute observations at least once in each calendar month that an emission unit operates.
- c. Semiannual Method 9 Observations. After observing emissions for three consecutive operating months under condition 49.1b, unless a six-minute average is greater than 15 percent and one or more observations are greater than 20 percent, observe emissions at least semiannually for 18 minutes.

Semiannual observations must be taken between four and seven months after the previous set of observations.

- d. Annual Method 9 Observations. After at least two semiannual 18-minute observations, unless a six-minute average is greater than 15 percent and one or more individual observations are greater than 20 percent, observe emissions at least annually.

Annual observations must be taken between 10 and 13 months after the previous observations and must include at least three 18-minute sets of observations.

- e. Increased Method 9 Frequency. If a six-minute average opacity is observed during the most recent set of observations to be greater than 15 percent and one or more observations are greater than 20 percent, then increase or maintain the 18-minute observation frequency for that emission unit to at least monthly intervals, until the criteria in condition 49.1c for semiannual monitoring are met.

49.2 Smoke/No Smoke Plan. Observe the exhaust for the presence or absence of visible emissions, excluding condensed water vapor.

- a. Initial Monitoring Frequency. Observe the exhaust during each calendar day that an emission unit operates.
- b. Reduced Monitoring Frequency. After the emission unit has been observed on 30 consecutive operating days, if the emission unit operated without visible smoke in the exhaust for those 30 days, then observe emissions at least once in every calendar month that an emission unit operates.
- c. Smoke Observed. If smoke is observed, either begin the Method 9 Plan of condition 49.1 or perform the corrective action required under condition 49.3.

49.3 Corrective Actions Based on Smoke/No Smoke Observations. If visible emissions are present in the exhaust during an observation performed under the Smoke/No Smoke Plan of condition 49.2, then the Permittee shall either follow the Method 9 plan of condition 49.1 or

- a. initiate actions to eliminate smoke from the emission unit within 24 hours of the observation;
- b. keep a written record of the starting date, the completion date, and a description of the actions taken to reduce smoke; and
- c. after completing the actions required under condition 49.3a,
 - (i) take Smoke/No Smoke observations in accordance with condition 49.2
 - (A) at least once per day for the next seven operating days and until the initial 30 day observation period is completed; and
 - (B) continue as described in condition 49.2b; or
 - (ii) if the actions taken under condition 49.3a do not eliminate the smoke, or if subsequent smoke is observed under the schedule of condition 49.3c(i)(A), then observe the exhaust using the Method 9 Plan unless the Department gives written approval to resume observations under the Smoke/No Smoke Plan; after observing smoke and making observations under the Method 9 Plan, the Permittee may at any time take corrective action that eliminates smoke and restart the Smoke/No Smoke Plan under condition 49.2a.

50. Visible Emissions Record Keeping. The Permittee shall keep records in accordance with this condition 50.

50.1 If using the Method 9 Plan of condition 49.1,

- a. the observer shall record

- (i) the name of the stationary source, emissions unit and location, stationary source type, observer's name and affiliation, and the date on the Visible Emissions Field Data Sheet in Section 14;
 - (ii) the time, estimated distance to the emissions location, approximate wind direction, estimated wind speed, description of the sky condition (presence and color of clouds), plume background, and operating rate (load or fuel consumption rate) on the sheet at the time opacity observations are initiated and completed;
 - (iii) the presence or absence of an attached or detached plume and the approximate distance from the emissions outlet to the point in the plume at which the observations are made;
 - (iv) opacity observations to the nearest five percent at 15-second intervals on the Visible Emissions Observation Record in Section 14; and
 - (v) the minimum number of observations required by the permit; each momentary observation recorded shall be deemed to represent the average opacity of emissions for a 15-second period;
- b. to determine the six-minute average opacity, divide the observations recorded on the record sheet into sets of 24 consecutive observations; sets need not be consecutive in time and in no case shall two sets overlap; for each set of 24 observations, calculate the average by summing the opacity of the 24 observations and dividing this sum by 24; record the average opacity on the sheet;
 - c. calculate and record the highest 18-consecutive-minute average observed.
- 50.2 If using the Smoke/No Smoke Plan of condition 49.2, record the following information in a written log for each observation and submit copies of the recorded information upon request of the Department:
- a. the date and time of the observation;
 - b. from Table 1, the ID of the emission unit observed;
 - c. whether visible emissions are present or absent in the exhaust;
 - d. a description of the background to the exhaust during the observation;
 - e. if the emission unit starts operation on the day of the observation, the startup time of the emission unit;
 - f. name and title of the person making the observation; and
 - g. operating rate (load or fuel consumption rate).

51. Visible Emissions Reporting. The Permittee shall report visible emissions as follows:

51.1 include in each Operating Report under condition 39:

- a. which visible-emissions plan of condition 49 was used for each emission unit; if more than one plan was used, give the time periods covered by each plan;
- b. for each emission unit under the Method 9 Plan,
 - (i) copies of the observation results (i.e. opacity observations) for each emission unit that used the Method 9 Plan, except for the observations the Permittee has already supplied to the Department; and
 - (ii) a summary to include:
 - (A) number of days observations were made;
 - (B) highest six-minute average observed; and
 - (C) dates when one or more observed six-minute averages were greater than 20 percent;
- c. for each emission unit under the Smoke/No Smoke Plan, the number of days that Smoke/No Smoke observations were made and which days, if any, that smoke was observed; and
- d. a summary of any monitoring or record keeping required under conditions 49 and 50 that was not done;

51.2 report under condition 38:

- a. the results of Method 9 observations that exceed an average 20 percent for any six-minute period; and
- b. if any monitoring under condition 49 was not performed when required, report within three days of the date the monitoring was required.

52. Particulate Matter Monitoring. The Permittee shall conduct source tests on diesel engines and fishmeal drier, Unit IDs 1 through 11, to determine the concentration of particulate matter (PM) in the exhaust of an emission unit in accordance with this condition 52.

52.1 Within six months of exceeding the criteria of condition 52.2a or 52.2b, either

- a. conduct a PM source test according to Section 9; or

- b. make repairs so that emissions no longer exceed the criteria of condition 52.2; to show that emissions are below those criteria, observe emissions as described in condition 49.1 under load conditions comparable to those when the criteria were exceeded.

52.2 Conduct the test according to condition 52.1 if:

- a. 18 consecutive minutes of Method 9 observations result in an 18-minute average opacity greater than 20 percent; or
- b. for an emission unit with an exhaust stack diameter that is less than 18 inches, 18 consecutive minutes of Method 9 observations result in an 18-minute average opacity that is greater than 15 percent and not more than 20 percent, unless the Department has waived this requirement in writing.

52.3 During each one hour PM source test run, observe the exhaust for 60 minutes in accordance with Method 9 and calculate the average opacity that was measured during each one hour test run. Submit a copy of these observations with the source test report.

52.4 The automatic PM source test requirement in condition 52.1 and 52.2 is waived for an emissions unit if a PM source test on that unit has shown compliance with the PM standard during this permit term.

53. Particulate Matter Record Keeping. The Permittee shall record the exhaust stack diameters of Emission Unit IDs 1 through 11.

54. Particulate Matter Reporting. The Permittee shall report as follows:

54.1 report under condition 38:

- a. the results of any PM source test that exceeds the PM emissions limit; or
- b. if one of the criteria of condition 52.2 was exceeded and the Permittee did not comply with either condition 52.1a or 52.1b, this must be reported by the day following the day compliance with condition 52.1 was required;

54.2 report observations in excess of the threshold of condition 52.2b within 30 days of the end of the month in which the observations occur;

54.3 in each Operating Report under condition number 39, include:

- a. the dates, emission unit IDs, and results when an observed 18-minute average was greater than an applicable threshold in condition 52.2;
- b. a summary of the results of any PM testing under condition 52; and

- c. copies of any visible emissions observation results (opacity observations) greater than the thresholds of condition 52.2, if they were not already submitted.

[18 AAC 50.346(c), 10/1/04]
[18 AAC 50.326(a), 10/1/04]
[40 C.F.R. 71.2 and 71.6(a)(3), 7/1/03]

Section 14. Visible Emission Evaluation Procedures

An observer qualified according to 40 C.F.R. §60, RM 9 shall use the following procedures to determine the reduction of visibility through the exhaust effluent.

Position. The qualified observer shall stand at a distance sufficient to provide a clear view of the emissions with the sun oriented in the 140° sector to his back. Consistent with maintaining the above requirement, the observer shall, as much as possible, make his observations from a position such that his line of vision is approximately perpendicular to the plume direction and, when observing opacity of emissions from rectangular outlets (e.g., roof monitors, open baghouses, noncircular stacks), approximately perpendicular to the longer axis of the outlet. The observer's line of sight should not include more than one plume at a time when multiple stacks are involved, and in any case the observer should make his observations with his line of sight perpendicular to the longer axis of such a set of multiple stacks (e.g., stub stacks on baghouses). The observer shall maintain a distance of at least 15 feet from the emission point.

Field Records. The observer shall record the name of the plant, emission location, stationary source type, observer's name and affiliation, and the date on the form. The time, estimated distance to the emission location, approximate wind direction, estimated wind speed, description of the sky condition (presence and color of clouds), and plume background are recorded on the sheet at the time opacity readings are initiated and completed.

Observations. Opacity observations shall be made at the point of greatest opacity in that portion of the plume where condensed water vapor is not present. The observer shall not look continuously at the plume but instead shall observe the plume momentarily at 15-second intervals. Unless directed to do otherwise in this permit, observe emissions for 60 consecutive minutes to obtain a minimum of 240 observations.

Attached Steam Plumes. When condensed water vapor is present within the plume as it emerges from the emission outlet, opacity observations shall be made beyond the point in the plume at which condensed water vapor is no longer visible. The observer shall record the approximate distance from the emission outlet to the point in the plume at which the observations are made.

Detached Steam Plume. When water vapor in the plume condenses and becomes visible at a distinct distance from the emission outlet, the opacity of emissions should be evaluated at the emission outlet prior to the condensation of water vapor and the formation of the steam plume.

Recording Observations. Opacity observations shall be recorded to the nearest 5 percent at 15-second intervals on the form contained in this section. Record the minimum number of observations required by the permit. Each momentary observation recorded shall be deemed to represent the average opacity of emissions for a 15-second period.

Data Reduction. To determine compliance with a standard set out in conditions 3.a and 11.1 of this permit, count the number of observations that exceed 20 percent opacity within an hour and record this number on the sheet.

To determine compliance with a standard set out in conditions 3.b and 11.2 of this permit, divide the observations recorded on the record sheet into sets of 24 consecutive observations. A set is composed of any 24 consecutive observations. Sets need not be consecutive in time and in no case shall two sets overlap. For each set of 24 observations, calculate the average by summing the opacity of the 24 observations and dividing this sum by 24. Record the average opacity on the sheet.

Visible Emissions Forms

Visible Emissions Field Data Sheet

Certified Observer: _____

Company &
Stationary Source: _____

Location: _____

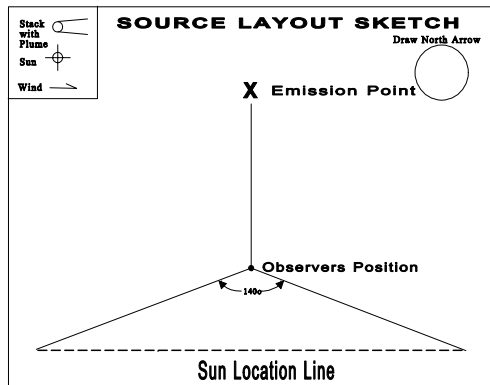
Test No.: _____ Date: _____

Emission Unit: _____

Production Rate/Operating Rate: _____

Unit Operating Hours: _____

Hrs. of observation: _____



Clock Time	Initial				Final
Observer location					
Distance to discharge					
Direction from discharge					
Height of observer point					
Background description					
Weather conditions					
Wind Direction					
Wind speed					
Ambient Temperature					
Relative humidity					
Sky conditions: (clear, overcast, % clouds, etc.)					
Plume description:					
Color					
Distance visible					
Water droplet plume? (Attached or detached?)					
Other information					

Section 15. ADEC Notification Form

Stationary Source Name

Air Quality Permit Number

Company Name

When did you discover the Excess Emissions/Permit Deviation?

Date: / / Time: :

When did the event/deviation?

Begin: Date: / / Time: : (please use 24hr clock)

End: Date: / / Time: : (please use 24hr clock)

What was the duration of the event/deviation: : (hrs:min) or days
(total # of hrs, min, or days, if intermittent then include only the duration of the actual emissions/deviation)

Reason for notification: (please check only 1 box and go to the corresponding section)

☐ Excess Emissions - Complete Section 1 and Certify

☐ Deviation from Permit Conditions - Complete Section 2 and Certify

☐ Deviation from COBC, CO, or Settlement Agreement - Complete Section 2 and Certify

Section 1: Excess Emissions

(a) Was the exceedance ☐ Intermittent or ☐ Continuous

(b) Cause of Event (Check one that applies):

☐ Start Up/Shut Down

☐ Natural Cause (weather/earthquake/flood)

☐ Control Equipment Failure

☐ Scheduled Maintenance/Equipment Adjustments

☐ Bad fuel/coal/gas

☐ Upset Condition

☐ Other

(c) Description

Describe briefly what happened and the cause. Include the parameters/operating conditions exceeded, limits, monitoring data and exceedance.

(d) Emission Units Involved:

Identify the emission unit involved in the event, using the same identification number and name as in the permit. Identify each emission standard potentially exceeded during the event and the exceedance.

Unit ID	Unit Name	Permit Condition Exceeded/Limit/Potential Exceedance

(e) Type of Incident (please check only one):

☐ Opacity %

☐ Venting (gas/scf)

☐ Control Equipment Down

- ☐ Fugitive Emissions ☐ Emission Limit Exceeded ☐ Record Keeping Failure
☐ Marine Vessel Opacity ☐ Failure to monitor/report ☐ Flaring
☐ Other:

(f) Unavoidable Emissions:

Do you intend to assert that these excess emissions were unavoidable?

☐ YES

☐ NO

Do you intend to assert the affirmative defense of 18 AAC 50.235?

☐ YES

☐ NO

Certify Report (go to end of form)

Section 2. Permit Deviations

(a) Permit Deviation Type (check one only box, corresponding with the section in the permit)

- ☐ Emission Unit Specific
☐ General Source Test/Monitoring Requirements
☐ Recordkeeping/Reporting/Compliance Certification
☐ Standard Conditions Not Included in Permit
☐ Generally Applicable Requirements
☐ Reporting/Monitoring for Diesel Engines
☐ Insignificant Source
☐ Facility Wide
☐ Other Section: (title of section and section number of your permit)

(b) Emission Unit Involved:

Identify the emission unit involved in the event, using the same identification number and name as in the permit. List the corresponding permit condition and the deviation.

Unit ID	Unit Name	Permit Condition /Potential Deviation

(c) Description of Potential Deviation:

Describe briefly what happened and the cause. Include the parameters/operating conditions and the potential deviation.

(d) Corrective Actions:

Describe actions taken to correct the deviation or potential deviation and to prevent future recurrence.

Certification:

Based on information and belief formed after reasonable inquiry, I certify that the statements and information in and attached to this document are true, accurate, and complete.

Printed Name: _____ Title _____ Date _____

Signature: _____ Phone Number _____

To Submit this Report:

Fax to: 907-451-2187;

Email to: airreports@dec.state.ak.us - *if emailed, the report must be certified within the Operating Report required for the same reporting period per condition 34;*

Mail to: ADEC, Air Permits Program, 610 University Avenue, Fairbanks, AK 99709-3643;

Phone Notification: 907-451-5173 - *phone notifications require a written follow-up report within the deadline listed in condition 38; OR*

Online Submission: *(Website is not yet available) - if submitted online, the report must be certified within the Operating Report required for the same reporting period per condition 34;*

Section 16. Material Balance Calculation

Calculate the exhaust concentration of SO₂ using the following equations:

$$A = 31,200 \times [\text{wt}\%S_{\text{fuel}}] = 31,200 \times \underline{\hspace{2cm}} = \underline{\hspace{2cm}}$$

$$B = 0.148 \times [\text{wt}\%S_{\text{fuel}}] = 0.148 \times \underline{\hspace{2cm}} = \underline{\hspace{2cm}}$$

$$C = 0.396 \times [\text{wt}\%C_{\text{fuel}}] = 0.396 \times \underline{\hspace{2cm}} = \underline{\hspace{2cm}}$$

$$D = 0.933 \times [\text{wt}\%H_{\text{fuel}}] = 0.933 \times \underline{\hspace{2cm}} = \underline{\hspace{2cm}}$$

$$E = B + C + D = \underline{\hspace{2cm}} + \underline{\hspace{2cm}} + \underline{\hspace{2cm}} = \underline{\hspace{2cm}}$$

$$F = 21 - [\text{vol}\%_{\text{dry}}O_{2,\text{exhaust}}] = 21 - \underline{\hspace{2cm}} = \underline{\hspace{2cm}}$$

$$G = [\text{vol}\%_{\text{dry}}O_{2,\text{exhaust}}] \div F = \underline{\hspace{2cm}} \div \underline{\hspace{2cm}} = \underline{\hspace{2cm}}$$

$$H = 1 + G = 1 + \underline{\hspace{2cm}} = \underline{\hspace{2cm}}$$

$$I = E \times H = \underline{\hspace{2cm}} \times \underline{\hspace{2cm}} = \underline{\hspace{2cm}}$$

$$\text{SO}_2 \text{ concentration} = A \div I = \underline{\hspace{2cm}} \div \underline{\hspace{2cm}} = \underline{\hspace{2cm}} \text{ ppm}$$

The wt%S_{fuel}, wt%C_{fuel}, and wt%H_{fuel} are equal to the weight percents of sulfur, carbon, and hydrogen in the fuel. These percentages should total 100%.

The fuel weight percent (wt%) of sulfur is obtained pursuant to condition 5. The fuel weight percents of carbon and hydrogen are obtained from the fuel refiner.

The volume percent of oxygen in the exhaust (vol%_{dry}O_{2, exhaust}) is obtained from oxygen meters, manufacturer's data, or from the most recent analysis under 40 C.F.R. 60, Appendix A-2, Method 3, adopted by reference in 18 AAC 50.040(a), at the same engine load used in the calculation.

Enter all of the data in percentages without dividing the percentages by 100. For example, if wt%S_{fuel} = 1.0%, then enter 1.0 into the equations, not 0.01, and if vol%_{dry}O_{2, exhaust} = 3.00%, then enter 3.00, not 0.03.

[18 AAC 50.346(c), 10/1/04]

Alaska Department of Environmental Conservation

Air Permits Program

Pre-Public Notice Draft

Alyeska Seafoods, Inc.

Unalaska Seafood Processing Facility

STATEMENT OF BASIS

of the terms and conditions for

Permit No. 241TVP02

Prepared by Jeanette Brena and Zeena Siddeek

Date

INTRODUCTION

This document sets forth the legal and factual basis for the terms and conditions of renewal Operating Permit No. 241TVP02.

The **Unalaska Seafood Processing Facility** is a stationary source that processes raw seafood, such as crab, cod and pollock, into edible products for human consumption. Byproducts and waste material from the process are converted into fishmeal. The stationary source is owned and operated by **Alyeska Seafoods, Inc.** **Alyeska Seafoods, Inc.** is the Permittee for the stationary source's operating permit.

PROCESS DESCRIPTION

As described in the application, the stationary source contains numerous diesel generators, boilers and a fishmeal plant. The stationary source is located on Iliuliuk Bay in the city of Unalaska on the island of Unalaska in the Aleutian Islands. The plant unloads raw fish and crab from fishing vessels at its loading dock. The cod is cleaned and salted for shipment. Pollock is cleaned and processed into surimi for shipment. Waste from these processes is converted to fishmeal in the fishmeal plant and prepared for shipment.

EMISSION UNIT INVENTORY AND DESCRIPTION

Section 4 of Operating Permit No. 241TVP02 contains a table describing the sources regulated by the permit. The table is provided for information and identification purposes only. The source rating/size provided in the table is not intended to create an enforceable limit.

EMISSIONS

Section 3 of Operating Permit No. 241TVP02 contains emission information as provided in the application. A summary of the potential to emit (PTE)⁷ and assessable PTE as indicated in the application is shown in the table below.

Table A: Emissions (TPY)

	NO _x	SO ₂	PM-10	VOC	CO	Total
Potential	296.4	18.3	5.8	11.2	40.9	372.6
Assessable	296.4	18.3	0	11.2	40.9	366.8

⁷ *Potential to Emit or PTE* means the maximum quantity of a release of an air contaminant, considering a stationary source's physical or operational design, based on continual operation of all emission units within the stationary source for 24 hours a day, 365 days a year, reduced by the effect of pollution control equipment and approved state or federal limitations on the capacity of the stationary source's emission units or the stationary source to emit an air contaminant, including limitations such as restrictions on hours or rates of operation and type or amount of material combusted, stored, or processed as defined in AS 46.14.990(21), effective 1/18/97.

The assessable PTE listed under condition 1.1 is the sum of the emissions of each individual regulated air contaminant for which the stationary source has the potential to emit quantities greater than 10 TPY. The emissions listed in Table A are estimates that are for informational use only. The listing of the emissions does not create an enforceable limit to the stationary source.

BASIS FOR REQUIRING AN OPERATING PERMIT

The **Unalaska Seafood Processing Facility** requires an operating permit under 18 AAC 50.326(a) because it has the potential to emit 100 TPY or more of a regulated air contaminant. The **Unalaska Seafood Processing Facility** meets the definition of an operating permit stationary source in the state regulations as listed in Section 2 of the permit.

The **Unalaska Seafood Processing Facility** is also a Prevention of Significant Deterioration (PSD) Major Facility as defined in 18 AAC 50.302(a)(1) because it has the potential to emit more than 250 TPY of a regulated air contaminant in an area classified as attainment or unclassifiable. However, the **Unalaska Seafood Processing Facility** has never undergone a PSD review because the stationary source was in full operation before 1977, and has not been modified after August 8, 1980 with an increase that exceeds the PSD significance levels set out in 40 C.F.R. 51.21.

Alaska regulations require operating permit applications to include identification of “regulated emission units.” As it applies to this stationary source, the state regulations require a description of:

- ⇒ Each emission unit regulated by a standard in 18 AAC 50.055, Industrial Processes and Fuel Burning Equipment, under 18 AAC 50.326(a); and
- ⇒ Emission units subject to requirements in an existing Department permit 18 AAC 50.326(a).

The emission units classified as “regulated emission units” according to the above Department regulations are listed in Table 1 of Operating Permit No. 241TVP02.

CURRENT AIR QUALITY PERMITS

Previous Air Quality Permit to Operate

The Department issued Permit No. 9625-AA006 on October 29, 1996. The history is as follows:

In 1985, Alyeska Seafoods purchased the Pan Alaska Seafood Processing facility in Unalaska, Alaska. At the time of purchase, the plant consisted of four Caterpillar D398 diesel generators, a York Shipley Steam Boiler, and a Cleaver Brooks steam boiler.

On September 23, 1986, Alyeska Seafoods applied for an air quality control permit to operate a fish meal plant. The new fish meal plant increased stationary source emissions by 3.9 tons of NO_x and a permit was issued on October 27, 1986. However, this application did not fully describe the fuel burning equipment at the stationary source. The Department was unaware that

the stationary source could have been classified as a PSD major due to the stationary source potential to emit.

In July 1987, Alyeska Seafoods, without obtaining any permit, installed a 1730 kW diesel generator at the plant. This installation again should have subjected the stationary source to the PSD permitting process as the stationary source should have been classified as a PSD major stationary source since it had a potential to emit NO_x over 250 tons per year. The new diesel generator had the potential to increase NO_x in excess of 40 tons per year (actually up to more than 215 tons per year).

In March 1990, Alyeska Seafoods installed a Seattle Boiler Works Steam boiler, another diesel generator with a rating of 2300 kW, a Kewanee Steam Boiler, and a Stord Hot Air Drier. These new equipment installations also should have been subjected to the PSD permitting process.

On June 29, 1990, the Department advised Alyeska Seafoods that the PSD permitting process was applicable to the stationary source due to these equipment additions and the fact that the stationary source had the potential to emit over 250 tons of a regulated contaminant. A Compliance Order by Consent was entered into on March 20, 1991, which required the stationary source to submit a PSD application. The stationary source did prepare a PSD permit application by August 6, 1992.

The PSD application submitted in 1992 was found to be incomplete. A complicated situation existed in Dutch Harbor. There were numerous seafood processing plants, floating processors and other shoreside installations with fuel burning equipment. There was a need to gather meteorological data and coordinate air quality permit applications from many of these plants. It took several years to prepare a revised permit application.

During this process, the stationary source changed the consultant it was using to prepare its air quality control permit applications. While the new consultant was preparing the permit application, it was determined that the actual cumulative increase in emissions due to all of the stationary source's modifications could be prevented from exceeding the significant increase levels for any pollutants listed in 40 CFR 52.21. The increase in emissions could be maintained at less than the PSD significance levels by limiting the amount of fuel burned in the various pieces of equipment at the stationary source. This being the case, the need for the PSD permit was eliminated.

When the stationary source finally submitted a permit application in May 1996, it was no longer a PSD submittal, but merely an air quality control permit to operate application. This application took into account all of the equipment at the stationary source, provided ambient air quality modeling, and requested limitations on the amount of fuel that could be burned at the stationary source to avoid PSD requirements. (PSD should be based on actual emissions increases. However, the Department must have used its discretion to consider existing stationary source allowable emissions to represent actual emissions, as provided for in 18 AAC 50.910).

On October 29, 1996, the Department issued Air Quality Control Permit to Operate No. 9625-AA006 to Alyeska Seafoods. This permit contained limitations on the amount of fuel which could be consumed in the various items of fuel burning equipment at the stationary source in order to protect NO₂ ambient air quality standards and to keep the net cumulative increase in

stationary source NO_x emissions below the PSD triggering level. The stationary source was restricted to burning fuel with a sulfur content of no more than 0.1 percent after December 31, 1996 to protect the SO₂ ambient standards and increments. NO_x emissions were limited to a less than a 40-ton-per-year increase from the allowable level of 259.56 TPY which existed at the time that Alyeska Seafoods purchased the stationary source.

Previous Title V Operating Permits

The Department issued the initial Title V Operating Permit No. 241TVP01 on May 23, 2000. Permit No. 241TVP01 Administrative Revision 1 was issued on August 7, 2002 and changed the fee requirements of the permit. Permit No. 241TVP01 Revision 2 was issued on February 21, 2003 and incorporated changes of Construction Permit No. 241CP02.

Construction Permits

The Department issued two construction permits since issuance of the Title V operating permit.

Construction Permit No. 241CP02 was issued on November 26, 2002 and was incorporated into the operating permit under Permit No. 241TVP01 Revision 2.

Construction Permit No. 241CP03 was issued on DATE and is incorporated into this Operating Permit No. 241TVP02.

Title V Operating Permit Application History

The initial Title V operating permit application submitted on December 5, 1997, was essentially a re-submittal of the same information that was submitted to the Department in the May 1996 application. The equipment was the same and the proposed fuel consumption and fuel sulfur requirements were identical. In August 1999, the stationary source notified the Department that it was retiring the Source Number 8, a 300 bhp Cleaver Brooks steam boiler and replacing it with a Seattle Boiler Works model HPFWB-1650 four pass wet back boiler with an S.T. Johnson Model FD98 low NO_x combustion system. The stationary source maintained that the fuel pump on this burner had been factory set so that the fuel input could not exceed 71 gallons per hour. The stationary source maintained that the heat content of the fuel was such that the heat input rate of this burner could not exceed 10,000,000 Btu per hour at 71 gallons per hour. The U.S. EPA was asked for an Applicability Determination, and EPA determined that the NSPS requirements of 40 C.F.R., Part 60, Subpart Dc, did not apply to the new boiler. The Operating Permit No. 241TVP01 was issued on May 23, 2000. Permit No. 241TVP01 Administrative Revision 1 was issued on August 7, 2002 and changed the fee requirements of the permit. Permit No. 241TVP01 Revision 2 was issued on February 21, 2003 and incorporated changes of Construction Permit No. 241CP02.

The renewal application for Permit No. 241TVP02 was submitted on August 30, 2004. Alyeska Seafoods submitted a construction permit application requesting revisions to the Construction Permit No. 241CP02 and an operating permit renewal application for Operating Permit No. 241TVP01 Revision 2.

Alyeska Seafoods conducted voluntary source tests in February 2004 on the diesel generators. The source tests revealed new NOx emission factors. Alyeska requested that the Department revise the cumulative equivalent total (CET) fuel use limit and equation governing the total NOx emissions for the engines to reflect the new NOx emissions factors. Alyeska is also requested that the CET fuel use limit and equation governing the total NOx emissions for the boilers be combined with the fuel use limit and NOx emissions for the fish meal drier. Additionally, Alyeska requested that the standard permit conditions in the operating permit be replaced with the more recent version of the standard permit conditions and delete the NSPS Subpart Kb applicability requirements consistent with the revisions to 40 CFR 60 effective October 15, 2003. Construction Permit No. 241CP03 and this renewal permit address these requests.

Facility-Specific Requirements Carried Forward

Table B lists the old requirement (condition) and the new condition that carries over the old requirement into the new permit.

Table B: Cross-Reference of Permit No. 9625-AA006 conditions to Permit No. 241TVP02 conditions.

Old Permit 9625-AA006	Facility-specific requirement	Permit No. 241TVP01	How condition was revised	Permit No. 241TVP01 Revision 1	How condition was revised	Permit No. 241TVP01 Revision 2	How condition was revised	Permit No. 241TVP02	How condition was revised
Condition 1 & Exhibit B	Compliance with NO ₂ State ambient standard and increment	9	Rewrote in terms of NOx emissions	8	Same as Permit No. 241TVP01	8	Removed individual unit fuel limits and replaced with a maximum fuel limit for Unit IDs 1-6 combined and for 7-10 combined	7	Combined fuel use limit for Unit IDs 7-11. Revised equation for Unit IDs 1-6
Condition 1 & Exhibit B	Compliance with SO ₂ State ambient standard and increment - Fuel sulfur content limit	10	Not revised; remains at 0.10 wt percent S	9	Same as Permit No. 241TVP01	10	Same as Permit No. 241TVP01	5 & 8	Same as Permit No. 241TVP01
5-11	Source Testing requirements	11 & Section 9	Added specific requirement to source test specific equipment	10 & Section 9	Same as Permit No. 241TVP01	11 & Section 9	Same as Permit No. 241TVP01	n/a	Requirement met
Exhibit B Part I.3	Requirements for burning used oil	12	Old permit only stated that used	11	Same as Permit No. 241TVP01	12	Same as Permit No. 241TVP01	9	Same as Permit No. 241TVP01

Old Permit 9625-AA006	Facility- specific requirement	Permit No. 241TVP01	How condition was revised	Permit No. 241TVP01 Revision 1	How condition was revised	Permit No. 241TVP01 Revision 2	How condition was revised	Permit No. 241TVP02	How condition was revised
			oil could be burned in Unit IDs 7-10. Permit No. 241TVP01 added detailed requirements and removed Unit ID 11 from condition						except added a ratio limit for blending used oil such that the PM limit was met
4, 8 & 16	Coastal Zone Management	13	Combined three CZM requirements into one	12	Same as Permit No. 241TVP01	n/a	Requirements removed	n/a	Same as Revision 2
12 and Exhibit C Part II	Process monitoring requirements	9.2 & 9.3	Restated requirements, but removed requirement to record and report kilowatt hours	8.2 & 8.3	Same as Permit No. 241TVP01	7.1	Same as Permit No. 241TVP01	7.1	Same as Permit No. 241TVP01
13 and 14	Excess Emissions Reporting	40	Requirements changed to reflect present excess emissions reporting procedures	39	Same as Permit No. 241TVP01	39	Same as Permit No. 241TVP01	38	Requirement updated
15	Access to the Facility	50	Essentially unchanged; rewrote to make more clear	49	Same as Permit No. 241TVP01	49	Same as Permit No. 241TVP01	48	Same as Permit No. 241TVP01

LEGAL AND FACTUAL BASIS FOR THE PERMIT CONDITIONS

The state and federal regulations for each condition are cited in Operating Permit No. 241TVP02.

Conditions 1 - 2, Emission Fees

Applicability: The regulations require all permits to include due dates for the payment of fees and any method the Permittee may use to re-compute assessable emissions.

Factual Basis: These standard conditions require the Permittee to pay fees in accordance with the Department's billing regulations. The billing regulations set the due dates for payment of fees based on the billing date.

The default assessable emissions are emissions of each air contaminant authorized by the permit (AS 46.14.250(h)(1)(A)). Air contaminant means any regulated air contaminant and any hazardous air contaminant. Therefore, assessable emissions under AS 46.14.250(h)(1)(A) means the **potential** to emit any air contaminant identified in the permit, including those not specifically limited by the permit. For example, hydrogen chloride (HCl) emissions from an incinerator are assessable emissions because they are a hazardous air contaminant, even if there is currently no emission limit on HCl for that class of incinerator.

The conditions also describe how the Permittee may calculate **actual** annual assessable emissions based on previous actual annual emissions. According to AS 46.14.250(h)(1)(B), assessable emissions are based on each air contaminant. Therefore, fees based on actual emissions must also be paid on any contaminant emitted whether or not the permit contains any limitation of that contaminant.

This standard condition specifies that, unless otherwise approved by the Department, calculations of assessable emission based on actual emissions use the most recent previous calendar year's emissions. Since each current year's assessable emission are based on the previous year, the Department will not give refunds or make additional billings at the end of the current year if the estimated emissions and current year actual emissions do not match. The Permittee will normally pay for actual emissions - just with a one-year time lag.

Projected actual emissions may differ from the previous year's actual emissions if there is a change at the stationary source, such as changes in equipment or an emission rate from existing equipment.

If the Permittee does not choose to annually calculate assessable emissions, emissions fees will be based on "potential to emit" (PTE).

The PTE set forth in the condition is based on liquid fuel with a sulfur content of 0.1 percent by weight. If the actual sulfur content of the fuel is greater than these assumptions, the assessable emissions calculations provided by the Permittee should reflect the actual sulfur content. The change in these values may result in SO₂ emissions that could trigger a permit review.

Condition 3 and Section 13, Visible Emission Standard

Applicability: The regulation applies to operation of all fuel-burning equipment and industrial process equipment in Alaska. Unit IDs 1 through 10 are fuel-burning equipment and Unit ID 11 is an industrial process.

Factual basis: The condition re-iterates federal and state opacity standards applicable to fuel-burning equipment and industrial process equipment. The Permittee shall not cause or allow their equipment to violate these standards.

This condition has recently been adopted into regulation. The monitoring, recordkeeping, and reporting (MR&R) requirements are listed in Section 13 of the permit.

For liquid fired emission units, visible emissions may be observed by either Method-9 or the Smoke/No Smoke plans as detailed in Section 13. Corrective actions such as maintenance procedures and either more frequent or less frequent testing may be required depending on the results of the observations.

The Permittee is required to record the results of all visible emission observations and record any actions taken to reduce visible emissions.

The Permittee is required to report: 1) emission in excess of federal and state visible emission standard and 2) deviations from permit conditions. The Permittee is required to include copies of the results of all visible emission observations with the Operating Report.

Condition 4 and Section 13, PM Standard

Applicability: The PM standard applies to operation of all fuel burning equipment and industrial process equipment in Alaska. Unit IDs 1 through 10 are fuel-burning equipment and Unit ID 11 is an industrial process. The State Implementation Plan (SIP) standard for PM applies to all fuel-burning equipment because it is contained I the federally approved SIP dated October 1983.

Factual basis: The condition requires the Permittee to comply with the state PM (also called grain loading) standard applicable to fuel burning and industrial process equipment. The Permittee may not cause or allow their equipment to violate this standard.

MR&R requirements are listed in Section 13 of the permit.

For liquid fired emission units, the Permittee is required to conduct PM source testing if threshold values for opacity are exceeded.

The Permittee is required to record the results of PM source tests.

The Permittee is required to report: 1) incidents when emission in excess of the opacity threshold values have been observed, and 2) results of PM source tests. The Permittee is required to include copies of the results of all visible emission observations with the Operating Report.

Condition 5, Sulfur Compound Emission Standards

Applicability: The condition applies to fuel-burning and industrial process equipment in Alaska. Unit IDs 1 through 10 are fuel-burning equipment and Unit ID 11 is an industrial process.

Factual basis: The condition re-iterates a sulfur emission standard applicable to fuel-burning equipment and industrial process equipment. The Permittee may not cause or allow their equipment to violate this standard.

Sulfur dioxide comes from the sulfur in the liquid, hydrocarbon fuel (e.g. diesel or No. 2 fuel oil). Fuel containing no more than 0.75 percent sulfur by weight will always comply with the emission standard. Fuel sulfur testing is sufficient to verify compliance with the standard.

Alyeska has a more restrictive fuel limit of 0.1 percent sulfur by weight. This limit ensures compliance with the SO₂ Ambient Air Quality Standards and Increments. For this reason, the Department did not use the standard condition language.

For liquid fired emission units, the Permittee is required to conduct tests to determine the sulfur content of each shipment received. In addition, the Permittee is required to calculate the sulfur content in the tank after each shipment.

The Permittee is required to report these results.

Conditions 6, NOx PSD Avoidance

Applicability: Applies because these are stationary source-specific requirements that were carried forward from previous operating and construction permits for PSD avoidance.

Factual Basis: The cumulative equivalent total fuel limits for engines and non-engines that are imposed in this condition were used by the applicant for PSD avoidance in its operating and construction permit applications for NOx. The condition was revised by Preliminary Construction Permit No. 241CP03, as incorporated into this permit. The emission factors used in these limits were revised from source testing in February 2004. Because of this recent source testing, the Department did not impose additional testing requirements in this renewal.

Recordkeeping, recording, and reporting conditions are from Preliminary Construction Permit No. 241CP03.

Condition 7, NOx Ambient Air Quality Standards and Increments

Applicability: Applies because these are stationary source-specific requirements that were carried forward from previous operating and construction permits for compliance with the attainment or maintenance of ambient air quality standards or maximum allowable ambient concentrations for NOx emissions.

Factual Basis: The fuel limits imposed in this condition were used by the Permittee for the purpose of NO₂ ambient air quality protection. The condition was revised by Preliminary Construction Permit No. 241CP03, as incorporated into this permit. The emission factors used in these limits were revised from source testing in February 2004. Because of this recent source testing, the Department did not impose additional testing requirements in this renewal.

Recordkeeping, recording, and reporting conditions are from Preliminary Construction Permit No. 241CP03.

Conditions 8, SO₂ Ambient Air Quality Standards and Increments

Applicability: Apply because these are stationary source-specific requirements that were carried forward from previous operating and construction permits for compliance with the attainment or maintenance of ambient air quality standards or maximum allowable ambient concentrations for SO₂.

Factual Basis: The limits imposed in these conditions were used by the Permittee for the purpose of SO₂ ambient air quality protection. The condition was incorporated from Permit to Operate No. 9625-AA006. The condition limits fuel consumption to 3,077,928 gallons per 12-months and fuel sulfur to 0.1 percent sulfur by weight. This fuel sulfur content also takes into account the sulfur dioxide special protection area in effect for Dutch Harbor.

Condition 9, Used Oil

Applicability: If the Permittee burns used oil in Units 7 through 10, then these requirements may apply.

Factual Basis: This condition specifies requirements for burning used oil at the stationary source in only emission Units 7 through 10. The condition amplifies the requirements for burning used oil as Permit to Operate No. 9625-AA006 only stated that it was allowed to be burned.

The Permittee shall remember that used oil is fuel that is limited and monitored as set out by conditions 6 through 8. In addition, although this condition should ensure compliance with the applicable emission standards of 18 AAC 50, this permit does NOT ensure compliance with other applicable state or federal laws concerning management, use, or disposal of used oil.

The permit lists blending, testing, recording, and reporting requirements. The Department added a requirement to blend at a ratio of no more than 1 part used oil with 6 parts virgin oil to comply with the particulate matter standard, unless Department approved to mix at a greater ratio. However, the Permittee must still test for sulfur and ensure that the ratio of used oil with comply with the sulfur limit. With a 0.1 percent sulfur limit, the sulfur limit and not the particulate matter limit may be the factor limiting the blend ratio.

Conditions 10 - 13, Insignificant Emission Units

Applicability: These general emission standards apply to all industrial processes fuel-burning equipment, and incinerators regardless of size.

Factual basis: The conditions re-iterate the general standards and require compliance for insignificant emission units. The Permittee may not cause or allow their equipment to violate these standards. Insignificant emission units are not listed in the permit unless specific monitoring, recordkeeping and reporting are necessary to ensure compliance.

The Department finds that the insignificant emission units at this stationary source do not need specific monitoring, recordkeeping and reporting to ensure compliance under these conditions.

Condition 10 requires certification that the emission units did not exceed state emission standards during the previous year and did not emit any prohibited air pollution. State air quality regulations adopted effective May 3, 2002 allow for an average six minute opacity observation. The existing regulation, limiting opacity to no more than 20 percent for more than 3 minutes in any one hour, is included because EPA Region X has not formally approved the changed opacity regulation as part of Alaska's State Implementation Plan (SIP).

Condition 14, Asbestos NESHAP

Applicability: If the Permittee engages in asbestos demolition and renovation, then these requirements may apply.

Factual Basis: The condition cites and requires compliance with the regulations that will apply if the Permittee engages in asbestos demolition or renovation. Because these regulations include adequate monitoring and reporting requirements and because the

Permittee is not currently engaged in such activity, simply citing the regulatory requirements is sufficient.

Condition 15, Refrigerant Recycling and Disposal

Applicability: This condition applies to Permittees that engage in recycling or disposal of certain refrigerants.

Factual Basis: The condition cites and requires compliance with the regulations that apply to Alyeska as an owner of appliances that contain or use a refrigerant. Because these regulations include adequate monitoring and reporting requirements, simply citing the regulatory requirements is sufficient.

The stationary source is not in the business of manufacturing or importing recycling and recovery equipment, so 40 C.F.R. 82.158 does not apply. The stationary source is not an equipment testing organization, so 40 C.F.R. 82.160 also does not apply.

Condition 16, Good Air Pollution Control Practice

Applicability: Applies to all emission units.

Factual Basis: The condition requires the Permittee to comply with good air pollution control practices for all emission units.

Maintaining and operating equipment in good working order is fundamental to preventing unnecessary or excess emissions. Standard conditions for monitoring compliance with emission standards are based on the assumption that good maintenance is performed. Without appropriate maintenance, equipment can deteriorate more quickly than with appropriate maintenance. If appropriate maintenance is not applied to the equipment, the Department may have to apply more frequent periodic monitoring requirements (unless the monitoring is already continuous) to ensure that the monitoring results are representative of actual emissions.

The Permittee is required to keep maintenance records to show that proper maintenance procedures were followed, and to make the records available to the Department. The Department may use these records as a trigger for requesting source testing if the records show that maintenance has been deferred.

Condition 17, Dilution

Applicability: Applies to the Permittee because the Permittee must comply with emission standards in 18 AAC 50.

Factual Basis: The requirement prohibits diluting emissions as a means of compliance. In practical terms, dilution only affects compliance when the emissions are being measured. Therefore, the monitoring is limited to immediately before source testing.

Dilution can occur by design or by leaks in the exhaust ductwork. Intentional dilution is not expected to be a problem, as it would increase operating costs by increasing induced draft fan power requirements. Careful review of source test plans and operating conditions will prevent intentional dilution. Therefore, only leaks need to be monitored under this condition.

The monitoring adequately prevents dilution by requiring leaks to be repaired before compliance with the emission standards are measured.

Condition 18, Reasonable Precautions to Prevent Fugitive Dust

Applicability: Bulk material handling requirements apply to the Permittee because the Permittee may engage in bulk material handling, transporting, or storing; or may engage in industrial activity at the stationary source.

Factual Basis: The underlying regulation, 18 AAC 50.045(d), requires the Permittee to take reasonable action to prevent PM from being emitted into the ambient air.

Condition 19, Stack Injection

Applicability: Applies to the stationary source because the stationary source contains a stack or emission unit modified after November 1, 1982.

Factual Basis: The condition restates the prohibition on stack injection (i.e. disposing of material by injecting it into a stack.) No specific monitoring for this condition is practical. Compliance is ensured by inspections, because the emission unit or stack would need to be modified to accommodate stack injection.

Condition 20, Open Burning

Applicability: These conditions apply if the Permittee conducts open burning at the stationary source.

Factual Basis: The condition requires the Permittee to comply with the regulatory requirements when conducting open burning at the stationary source.

The permit does require the Permittee to keep "sufficient records" to demonstrate compliance with the standards for conducting open burning, but does not specify what these records should contain.

Additional monitoring is achieved through Condition 21, which requires a record of complaints. Therefore, the Department does not believe that additional monitoring is warranted.

Condition 21, Air Pollution Prohibited

Applicability: Air Pollution Prohibited requirements apply to the stationary source because the stationary source will have emissions.

Factual Basis: The condition prohibits the Permittee from causing any emission which is injurious to human health or welfare, animal or plant life, or property, or which would unreasonably interfere with the enjoyment of life or property. While the other permit conditions and emissions limitation should ensure compliance with this condition, unforeseen emission impacts can cause violations of this standard. These violations would go undetected except for complaints from affected persons. Therefore, to monitor compliance, the Permittee must monitor and respond to complaints.

The Permittee is required to report any complaints and injurious emissions. The Permittee must keep records of the date, time, and nature of all complaints received and summary of the investigation and corrective actions undertaken for these complaints and to submit copies of these records upon request of the Department.

The Department will determine whether the necessary actions were taken. No corrective actions are necessary if the complaint is frivolous or there is not a violation of 18 AAC 50.110, however this condition is intended to prevent the Permittee from prejudging that complaints are invalid.

Condition 22, Technology-Based Emission Standards

Applicability: Technology Based Emission Standard requirements apply to the stationary source because the stationary source contains equipment subject to a technology-based emission standard, such as BACT, MACT, LAER, NSPS or other “technologically feasible” determinations.

Factual Basis: The Permittee is required to take reasonable steps to minimize emissions if certain activity causes an exceedance of any technology-based emission standard in this permit. The conditions of this permit list applicable technology-based emission standards and require excess emission reporting for each standard in accordance with condition 38. Excess emission reporting under condition 38 requires information on the steps taken to minimize emissions. Monitoring of compliance for this condition consists of the report required under condition 38.

Condition 23, Permit Renewal

Applicability: Applies if the Permittee intends to renew the permit.

Factual Basis: The condition restates the regulatory deadlines, citing the specific dates applicable to the stationary source. Submittal of the renewal application is sufficient monitoring, recordkeeping and reporting.

Condition 24, Requested Source Tests

Applicability: Standard condition to be included in all permits.

Factual Basis: Condition requires the Permittee to conduct source tests as requested by the Department, therefore no monitoring is needed. Conducting the requested source test is its own monitoring.

Conditions 25 through 27, Operating Conditions, Reference Test Methods, Excess Air Requirements

Applicability: Apply because the Permittee is required to conduct source tests by this permit.

Factual Basis: The Permittee is required to conduct source test as set out in conditions 25 through 27. These conditions supplement the specific monitoring requirements stated elsewhere in this permit. Compliance monitoring with conditions 25 through 27 consist of the test reports required by condition 32.

Condition 28, Test Exemption

Applicability: Applies when the emission unit exhaust is observed for visible emissions.

Factual Basis: As provided in 18 AAC 50.345(a), the requirements for test plans, notifications and reports do not apply to visible emissions observations by smoke readers, except in connection with required particulate matter testing.

Conditions 29 - 32, Test Deadline Extension, Test Plans, Notifications and Reports

Applicability: Apply because the Permittee is required to conduct source test by this permit.

Factual Basis: Standard conditions 18 AAC 50.345(l) - (o) are incorporated through these conditions. These standard conditions supplement specific monitoring requirements stated elsewhere in this permit. The source test itself monitors compliance with this condition.

Condition 33, PM Calculations

Applicability: Applies when the Permittee tests for compliance with the PM standard.

Factual Basis: The condition incorporates a regulatory requirement for PM source tests. This condition supplements specific monitoring requirements stated elsewhere in this permit.

Condition 34, Certification

Applicability: Applies because the permit requires the Permittee to submit reports, and because the condition is a standard condition.

Factual Basis: This condition restates the regulatory requirement that all reports must be certified. To ease the certification burden, the condition allows the excess emission reports to be certified with the semi-annual Operating Report, although the excess emission reports must be submitted more frequently. This condition supplements the reporting requirements of the permit and no monitoring, recordkeeping or reporting for this condition is needed.

Condition 35, Submittals

Applicability: Applies because the Permittee is required to send reports to the Department.

Factual Basis: This condition merely specifies where submittals to the Department should be sent. Receipt of the submittal at the correct Department office is sufficient monitoring for this condition. This condition supplements the reporting requirements of the permit and no monitoring, recordkeeping or reporting for this condition is needed.

Condition 36, Information Requests

Applicability: Applies to all Permittees, and incorporates a standard condition.

Factual Basis: Incorporates a standard condition in regulation, which tells the Permittee to submit information requested by the Department. Receipt of the requested information is adequate monitoring.

Condition 37, Recordkeeping Requirements

Applicability: Applies to records required by a permit.

Factual Basis: The condition restates the regulatory requirements for recordkeeping, and supplements the recordkeeping defined for specific conditions in the permit. The records being kept provide adequate evidence of compliance with this requirement, therefore, no additional monitoring, recordkeeping or reporting is required.

Condition 38, Excess Emission and Permit Deviation Reports

Applicability: Applies when the emissions or operations deviate from the requirements of the permit.

Factual Basis: This condition satisfies two state regulations related to excess emissions - the technology-based emission standard regulation and the excess emission regulation. Although there are some differences between the regulations, the condition satisfies the requirements of each regulation.

The reports themselves and the other monitoring records required under this permit provide monitoring of whether the Permittee has complied with the condition. Please note that there may be additional federally required excess emission reporting requirements.

Condition 39, NSPS and NESHAP Reports

Applicability: Applies to facilities subject to NSPS and NESHAP federal regulations.

Factual Basis: The condition supplements the specific reporting requirements in 40 C.F.R. 60 and 40 C.F.R. 61. The reports themselves provide monitoring for compliance with this condition.

Condition 40, Operating Reports

Applicability: Applies to all permits.

Factual Basis: The condition restates the requirements for reports listed in regulation. The condition supplements the specific reporting requirements elsewhere in the permit. The reports themselves provide monitoring for compliance with this condition.

Condition 41, Annual Compliance Certifications

Applicability: Applies to all Permittees.

Factual Basis: This condition specifies the periodic compliance certification requirements, and specifies a due date for the annual compliance certification. Because this requirement is a report, no monitoring, recordkeeping or reporting is needed.

Conditions 42 - 48, Standard Conditions

Applicability: Applies to all operating permits.

Factual Basis: These are standard conditions required for all operating permits.

Section 12, Permit Shield Decisions

Applicability: Applies because the Permittee has requested a shield for the applicable requirements listed under this condition.

Factual Basis: Table 3 of Permit No. 241TVP02 explains the permit shield requests and the Department's applicability determination. The table sets forth the requirements that the Department determined were not applicable to the stationary source, based on the permit application, past operating permit, construction permits and inspection reports.